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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DANIEL GONZALEZ and JEFFREY HUGHES,  
on behalf of themselves and others similarly  
situated,

Plaintiffs,

v.

DIAMOND RESORTS INTERNATIONAL  
MARKETING, INC., DIAMOND RESORTS  
INTERNATIONAL, INC., DIAMOND  
RESORTS CORPORATION, and WEST MAUI  
RESORTS PARTNERS, L.P.,

Defendants.

Case No. 2:18-cv-00979-APG-NJK

STIPULATION AND ORDER  
EXTENDING THE DEADLINE FOR  
PLAINTIFFS TO FILE THEIR  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT AND THE DEADLINE  
FOR DEFENDANTS TO FILE  
THEIR REPLY

(FIRST REQUEST)

Plaintiffs Daniel Gonzalez and Jeffrey Hughes, on behalf of themselves and others  
similarly situated (collectively "Plaintiffs"), and Defendants Diamond Resorts International

Marketing, Inc. and West Maui Resorts Partners, L.P. (collectively “Defendants”) (Plaintiffs and Defendants are collectively referred to as “the Parties”), by and through their respective counsel, hereby submit this Stipulation and Order extending the deadline for Plaintiffs to file their opposition to Defendants’ Motion for Summary Judgment by seven days and extending Defendants’ deadline to file their reply by a mutual, corresponding, seven days. Defendants filed their Motion for Summary Judgment on March 19, 2021. (ECF No. 202.) Plaintiffs’ opposition is due by April 9, 2021. This is the Parties’ first request to extend the deadlines for Plaintiffs to file their opposition to Defendants’ Motion for Summary Judgment and for Defendants to file their reply to Plaintiffs’ opposition to Defendants’ Motion for Summary Judgment.

The Parties HEREBY STIPULATE AND AGREE as to the following:

1. On March 19, 2021, Defendants filed their Motion for Summary Judgment (ECF No. 202) and Plaintiffs’ opposition is due on or before April 9, 2021.

2. Plaintiffs’ lead counsel, Martin Holmes, is traveling out of state from his home on April 5, 2021, to undergo medical testing that week and a surgical procedure under general anesthesia on April 9, 2021, the due date of Plaintiffs’ Opposition. Mr. Holmes is scheduled to return to home on April 12, 2021.

3. During the time period between April 5, 2021 and April 12, 2021, Mr. Holmes will have limited access to emails and other communication with co-counsel and staff, and will not be in the office during the week of April 5 – 9, 2021, to oversee the completion and filing of Plaintiffs’ opposition to Defendants’ Motion for Summary Judgment.

4. Plaintiffs’ counsel has conferred with Defendants’ counsel. In light of the circumstances, the Parties submit that good cause exists for a mutual, seven-day, expansion of the briefing schedule and extension of the filing deadlines. Specifically, Plaintiffs would have four weeks instead of three weeks to submit their opposition, which extends their deadline from April 9, 2021, to April 16, 2021. Likewise, Defendants would have three weeks instead of two weeks

1 to submit their reply, which extends their deadline from April 30, 2021 to May 7, 2021.<sup>1</sup> The  
2 requested extensions should not cause any material delay in these proceedings.

3 5. Based on the foregoing, the Parties stipulate that Plaintiffs' opposition to  
4 Defendants' Motion for Summary Judgments shall be filed on or before April 16, 2021 and  
5 Defendants reply to Plaintiffs' opposition to Defendants' Motion for Summary Judgment shall be  
6 filed on or before May 7, 2021.

7  
8 IT IS SO STIPULATED this 31<sup>st</sup> day of March, 2021.

9  
10 DICKINSON WRIGHT PLLC

LEWIS ROCA ROTHGERBER CHRISTIE LLP

11 /s/ Martin D. Holmes

/s/ Ferry Eden Lopez

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25  
26 Based on the Parties' stipulations, and for good cause shown, it is hereby ORDERED that  
27 the Plaintiffs' opposition to Defendants' Motion for Summary Judgment shall be filed on or before

28 <sup>1</sup> Pursuant to Local Rule 7-2(b), Defendants' reply is due 14 days after service of Plaintiffs' response.

1 April 16, 2021 and Defendants' reply to Plaintiffs' opposition to Defendants' Motion for Summary  
2 Judgment shall be filed on or before May 7, 2021.

3  
4 IT IS SO ORDERED:

5   
6 ANDREW P. GORDON  
7 United States District Judge

8 DATED: April 1, 2021  
9

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on March 31, 2021, I caused a true and accurate copy of the foregoing  
12 STIPULATION AND ORDER EXTENDING THE DEADLINE FOR PLAINTIFFS TO FILE  
13 THEIR OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND  
14 THE DEADLINE FOR DEFENDANTS TO FILE THEIR REPLY to be filed with the Clerk of  
15 the Court via the Court's CM/ECF system, which sent an electronic copy of same to the following  
16 counsel of record:

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26 *Attorneys for Defendants*

27 /s/ Martin D. Holmes  
Martin D. Holmes